

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

PETRÓLEOS DE VENEZUELA, S.A., PDVSA
PETRÓLEO, S.A., and PDV HOLDING, INC.,

Plaintiffs,

- against -

MUFG UNION BANK, N.A. and GLAS AMERICAS
LLC,

Defendants.

Case No: 19-cv-10023-KPF

AFFIRMATION PURSUANT TO LOCAL CIVIL RULE 1.4

JAMES L. FERGUSON, an attorney duly admitted to practice before this Honorable Court, hereby affirms and says:

1. I am an associate with the law firm Paul Hastings LLP (“Paul Hastings”), attorneys for Plaintiffs Petróleos de Venezuela, S.A., and PDVSA Petróleo, S.A. (collectively “Plaintiffs”) in the above-captioned action.

2. I submit this Affirmation pursuant to Local Civil Rule 1.4 in support of the accompanying motion to withdraw the appearance of James R. Bliss as counsel of record for Plaintiffs.

3. There are no current deadlines in this litigation. The case is currently on appeal.

4. This request is being made because Mr. Bliss is no longer associated with Paul Hastings.

5. Plaintiffs will continue to be represented in this matter by Kurt W. Hansson and James L. Ferguson of Paul Hastings, and accordingly no delay or prejudice to any party will result from this withdrawal.

6. There is no retaining or charging lien being asserted.

7. Wherefore the undersigned respectfully requests that the Court sign the proposed Order submitted herewith permitting Mr. Bliss to withdraw as counsel of record for Plaintiffs in this action and directing the Clerk to amend the docket and other court records in accordance therewith.

Dated: September 27, 2023

Respectfully submitted,

/s/ James L. Ferguson
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